

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**COALITION PLAINTIFFS’ RESPONSE TO [689] STATE DEFENDANTS’  
REQUEST FOR STATUS CONFERENCE**

The Coalition Plaintiffs<sup>1</sup> respond to STATE DEFENDANTS’ REQUEST FOR STATUS CONFERENCE AND NOTICE OF DECERTIFICATION OF GEMS/DRE SYSTEM (Doc. 689) as follows:

1. Coalition Plaintiffs agree that a status conference is warranted.
2. Coalition Plaintiffs oppose the State Defendants’ request for this Court to authorize the State to “dispose of” components of the GEMS/DRE system in violation of the State’s duty to preserve evidence relevant to this and other litigation.

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<sup>1</sup> The “Coalition Plaintiffs” are Plaintiffs Coalition for Good Governance, Laura Digges, William Digges III, Megan Missett, and Ricardo Davis.

3. Coalition Plaintiffs intend to supply this Court with a Status Report that will address the urgent need to preserve the GEMS/DRE system components, as well as explaining the ongoing relevance of the GEMS/DRE evidence for Coalition Plaintiffs' currently live claims, in light of the preliminary expert findings made during review the KSU/CES election server preserved by the FBI. Coalition Plaintiffs will submit the preliminary report as a sealed document if appropriate.

4. Coalition Plaintiffs also expect to file a Status Report in the near term to apprise this Court of the significant delays and problems that are presently impairing timely and successful implementation of the Dominion Voting System.

Respectfully submitted this 7th day of January, 2030.

/s/ Bruce P. Brown

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**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Robert A. McGuire, III

Robert A. McGuire, III

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2020, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Robert A. McGuire, III  
Robert A. McGuire, III